

**Appendix A – Cultural Resource Assessment, Tribal Concurrence,
and Mississippi SHPO Concurrence**

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Cultural Resources Survey of the Proposed Toyota Wastewater Alignment, Lee County, Mississippi

Report prepared for Mike Goff, Wildlife Technical Services, Inc., P.O. Box 820188, Vicksburg, MS 39182

On March 2, 9, and 12, 2008, I conducted a cultural resources survey of approximately 20 acres (8.4 miles of proposed sewer line with a ROW of 20 feet) within and near the southern city limits of Tupelo, MS (figs. 1-3). Ground cover varied (figs. 4-12) with excellent ground visibility along the western half of the survey area where the proposed sewer line will be located in cultivated fields in the Coonewah Creek bottoms but ground visibility in the southern and eastern portions of the survey was generally fair to poor (figs. 1-3). The entire sewer line route was walked. Shovel tests were not dug when the ground could be clearly seen (plowed fields, bare ground, eroded areas, places where the chalk substratum was exposed). When needed, shovel testing was done at 40 paces (approximately 30 m) intervals. Because prairie soil is extremely difficult to pass through a screen, the shovel test dirt was turned out on the ground, cut up with the shovel, then troweled thoroughly, searching for artifacts. The entire survey region showed evidence of extensive erosion, in no instance was a well developed A horizon observed. Shovel tests in the uplands typically exposed yellowish-red clay subsoils. Shovel tests in the floodplains exposed grayish-brown silty clay subsoils. It was never necessary to dig the shovel test deeper than about 35 cm. The notes and artifacts relating to this survey will be curated at the Center for Archaeological Research at the University of Mississippi.

The physiography and projected ground cover of the survey area is determined primarily by the underlying geology. The survey area falls into the Black Prairie physiographic zone (Lowe 1911) which is characterized by rolling uplands and broad, flat stream bottoms. The primary geological formation underlying this zone is the Selma Chalk (Stephenson and Monroe 1940) which resulted in clay and clay loam soils that supported oaks and hickory where the soil was relatively deep and red cedar, sweetgum, post oak and prairie grasses where the soil was thin (Kuchler 1964; Lowe 1911). These broad upland prairies were a major factor in the early historic settlement of the region and may have been and an important factor in the late prehistoric occupation of the Chickasaw to the uplands (Johnson 1996; c.f. Hogue et al. 1996) in northeastern Mississippi.

A substantial amount of archaeological research has been done in and around Tupelo. Jennings (1941) set the stage for all the work to follow in his report of work done in preparation for the construction of the Natchez Trace Parkway. In that report he defined the major ceramic types for the Woodland and Chickasaw occupations of the area and his sequence has withstood the test of time with minor revisions (Cotter and Corbett 1951; Bohannon 1972; Jenkin 1981). The Chickasaw portion of the ceramic sequence has also been refined (Stubbs 1982; Atkinson 1987; Lieb 2004) but still remains essentially the same. Although the region was obviously used during the Archaic period (see for example Johnson and Brookes 1989 review of Benton caches in the area immediately to the south) and there are Mississippian sites to on the terraces of the major creeks draining into the Tombigbee River (e.g. Atkinson et al. 1980; O'Hear et al. 1981) and there are Mississippian period sites to the south of Lee County in the upland Prairie (Hogue and Peacock 1995; Rafferty 1996), there is relatively little Mississippian occupation in the uplands in vicinity of the survey area (Stubbs 1983; Johnson 1996). Most of the archaeological research in Lee County has focused on the intensive colonial period Chickasaw settlement that

centered on the city of Tupelo (Stubbs 1983; Atkinson 1987; Johnson 2000; Johnson et al. in press). In fact, the survey area surrounds on three sides the 1670 -1736 Small Prairie settlement of the Chickasaw. The majority of the recorded sites that fall near the survey area relate to the Chickasaw occupation of north Mississippi. Both of the sites which will be directly impacted by the sewer line have 18th century components.

Fourteen CRM surveys have been conducted within $\frac{3}{4}$ of a mile of the survey area:

- 78-050 Atkinson, CRS of Tupelo waste water treatment plant and pipeline
- 82-085 Stubbs, Chickasaw Archaeology Survey
- 86-046 Atkinson, CRS of Cooper Tire and Rubber Co. tract, Tupelo, MS (90 acres)
- 89-078 Atkinson, CRS of 1 acre borrow area in Lee Co.
- 92-321 Lauro, CRS of proposed sewerline, City of Tupelo, Lee Co. (9 acres)
- 96-198 mislabeled, unknown
- 97-100 Underwood, CRS of United Church Homes proposed housing complex (15 acres)
- 97-164 Gray, CRS of proposed relocation of MS Hwy 6 between Pontotoc & Tupelo
- 00-145 Shelby, CRS of proposed cell tower in Verona (1 acre)
- 00-345 Lauro, CRS of proposed cell tower (2 acres)
- 02-050 Thorne, CRS of proposed cell tower in Tupelo (1 acre)
- 03-250 O'Hear, CRS of proposed 6 acre development near Tupelo
- 04-343 Johnson, CRS of proposed location of a recycling facility (3 acres)
- 07-304 Lauro, Phase I CRS of Proposed Sewer Line Toyota Plant Project

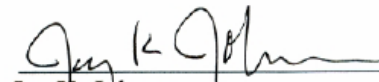
There are 27 recorded archaeological sites within $\frac{3}{4}$ of a mile of the survey area (22Le553, 566, 599, 616, 618, 619, 620, 621, 624, 625, 649, 650, 662, 698, 870, 900, 901, 999, 1000, 1001, 1002, 1004, 1005, 1006, 1011, 1016, 1017), many of which are located along the western bluff lines of Coonewah and Town Creeks. A large number of these sites contain 18th century Chickasaw material. All but two of these sites (22Le599 and 999) are located well outside the ROW of the proposed pipeline.

One of these sites, 22Le599 is located on a knoll at the edge of the Town Creek floodplain (fig. 2). According to the site card, a small collection of Chickasaw artifacts were recovered by Jim Atkinson at this location. The portion of the site which is crossed by the proposed pipeline is covered in extremely thin sage grass overlaying the chalk substratum interspersed with small cedar trees (fig. 11). Ground visibility was excellent. About half an hour was spent searching the impact area, nothing could be found. The proposed pipeline route will run well to the west of a small, possible mound located near the northeastern corner of the site (fig. 13).

The second site, 22Le999, was recorded during the phase I survey done in preparation for the relocation of MS Highway 6. In fact, that route and the proposed sewer line route coincide in several places along the southern segment of the survey area. At the time that the site was recorded, the entire field was in cultivation. Ground cover was recorded at 0%. A fairly large collection of Early Archaic, Middle Woodland, and Historic period artifacts were reported. The site was not considered to be significant. Only the south $\frac{1}{4}$ of the site was in cultivation at the time of the current survey (fig. 8), the rest is grown up in thin sage grass. The cultivated portion of the field was walked under ideal ground visibility and nothing was found. A single Baldwin Plain sherd was found in the area covered in sage grass where ground visibility was fair. This sand tempered plain sherd relates to the Middle Woodland component recorded earlier for the site. Two lines of shovel tests, spaced 5 paces (about 3.75 m) on either side of the proposed

sewer line route were dug, shovel testing at 10 pace (about 7.5 m) intervals across the entire site area. Nothing was found in the shovel tests. This site does not appear to be significant.

Two and a half man days were spent on the fieldwork. The relocated prehistoric site (22Le999) cannot be considered eligible for nomination to the National Register of Historic Places. The portion of 22Le599 that will be impacted by the project has been eroded down to the chalk and no artifacts could be found despite good to excellent ground visibility. Nothing else was found. Therefore, I recommend that the surveyed area be considered cleared of significant cultural resources.



Jay K. Johnson
Archaeologist, Ph.D.
908 Chickasaw Road
Oxford, MS 38655
662 236-1720 (evenings)
662 915-7339 (working hours)

References Cited

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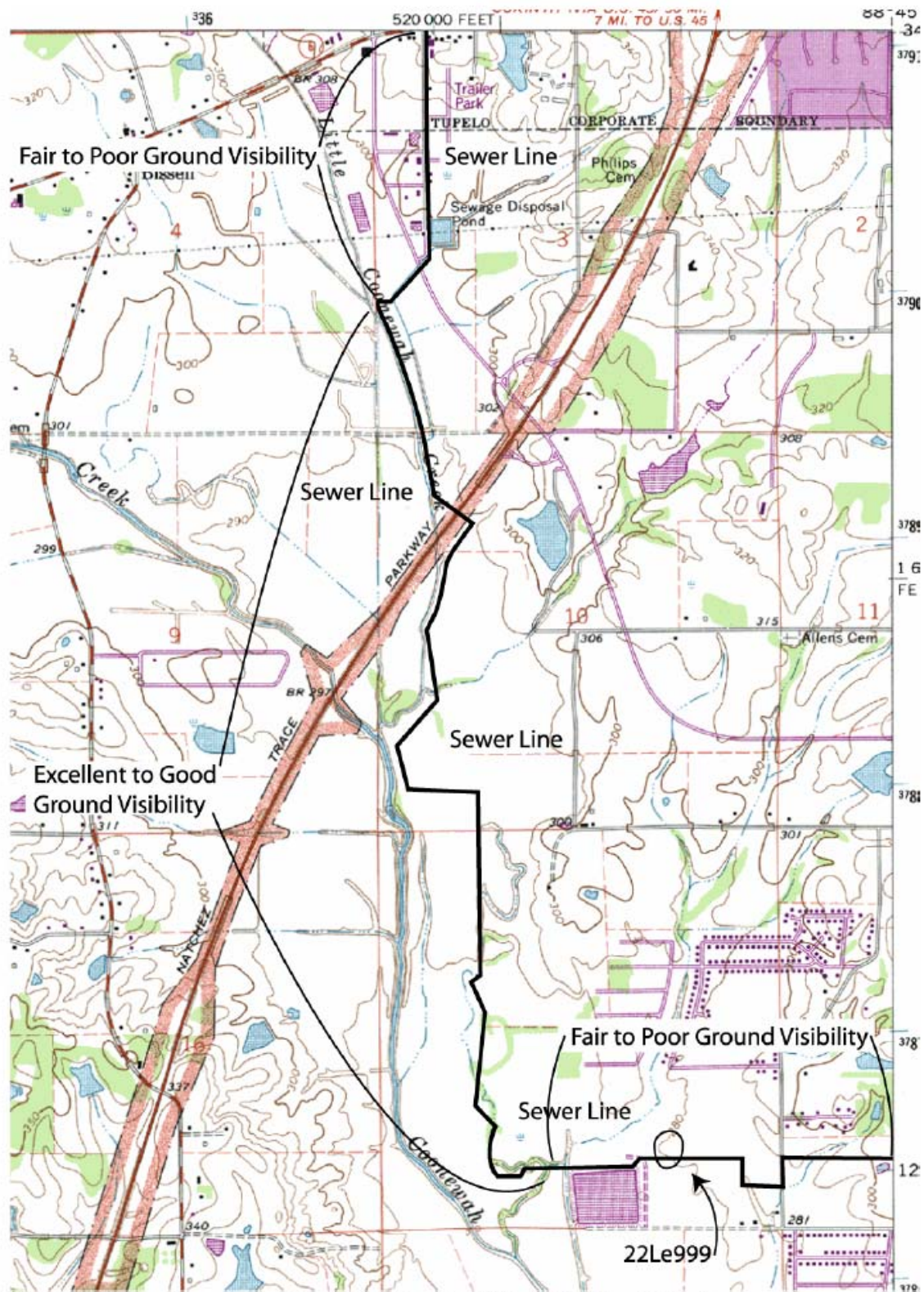


Figure 1. Sewer line route, Sec 3, 10, 14, 15, T10S, R5E, Bissell Quad

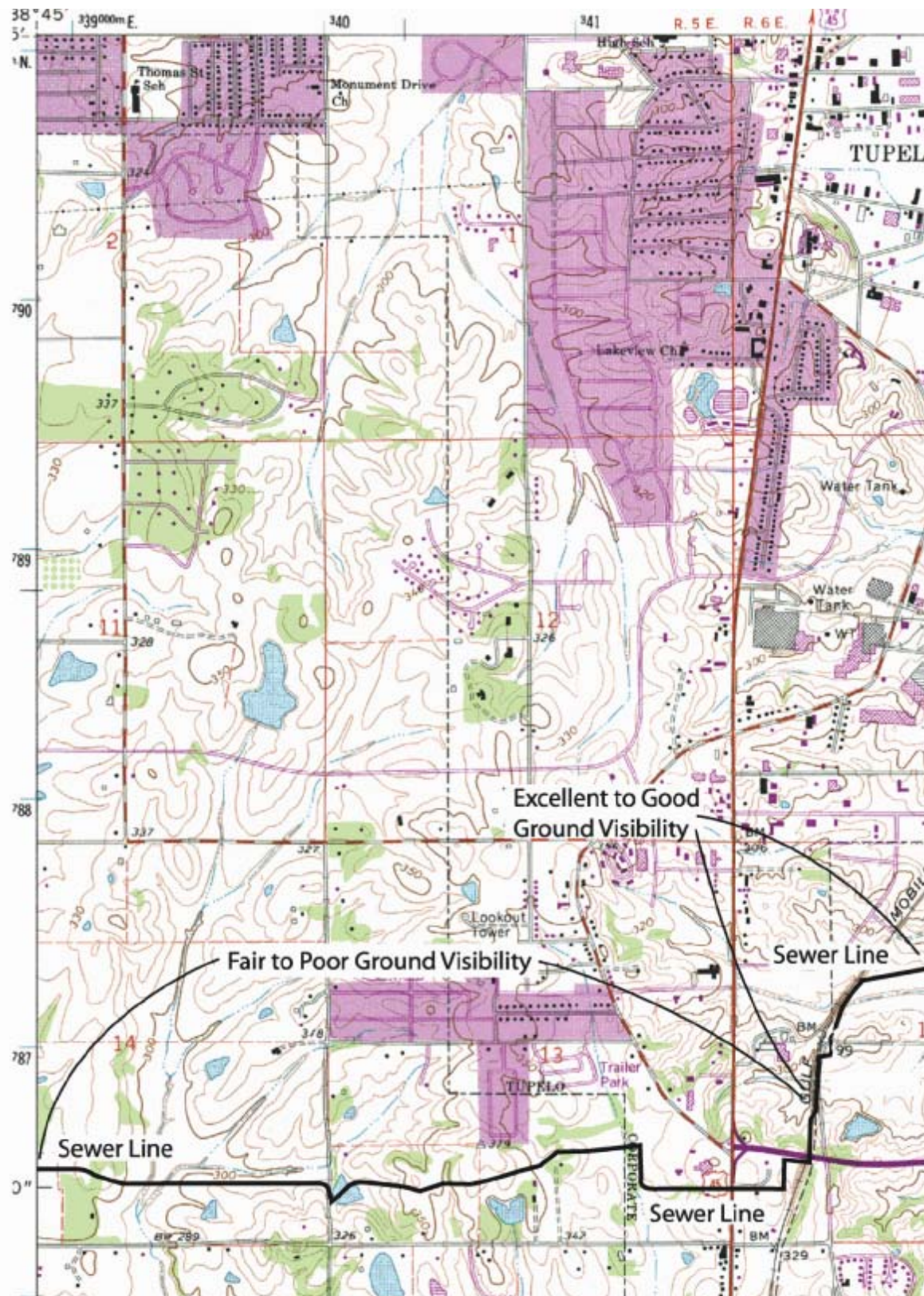


Figure 2. Sewer line route, Sec 13, 14, T10S, R5E, Sec 18, T10S, R6E, Verona Quad

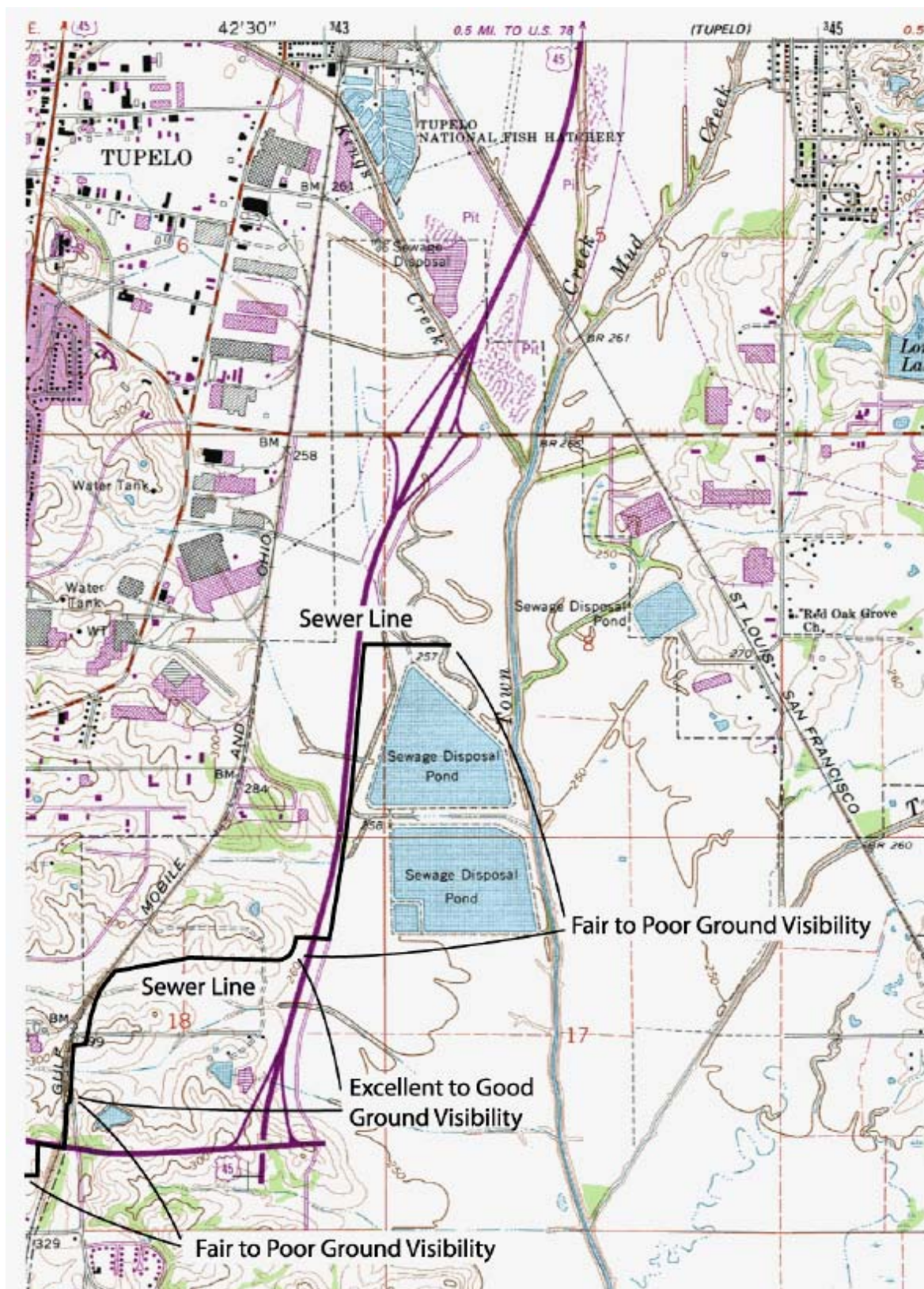


Figure 3. Sewer line route, Sec 7, 8, 18, T10S, R6E, Verona Quad



Figure 4. Sewer line route following Glasgow Lane, view to the south



Figure 5. Sewer line route, just to the north of the Natchez Trace Parkway, view to the south



Figure 6. Sewer line route, just to the south of Tupelo High School, view to the south



Figure 7. Sewer line route, near Coonewah Creek, view to the south



Figure 8. Sewer line route, south edge of 22Le999, view to the east



Figure 9. Sewer line route, to the east of Willie Moore Road, view to the east



Figure 10. Sewer line route, crossing South Thomas Street Extended, view to the east



Figure 11. Sewer line route, 22Le599, view to the east



Figure 12. Sewer line route, alongside Highway 78, view to the north

Omitted for security purposes

Figure 13. 22Le599, Verona Quad.



Tennessee Valley Authority, 400 West Summit Hill Drive, Knoxville, Tennessee 37902-1499

April 25, 2008

(Name)

Address

Address

Address

Address

Dear _____:

APPALACHIAN REGIONAL COMMISSION GRANT IN SUPPORT OF AN 11.9 MILE PORTION OF A FORCED MAIN SEWER LINE BETWEEN COLEY ROAD AND TUPELO WASTEWATER TREATMENT PLANT, LEE COUNTY, MISSISSIPPI

The Tennessee Valley Authority (TVA) is administering a \$1,500,000 Appalachian Regional Commission (ARC) grant to the Pontotoc, Lee, & Union Counties (PUL) Alliance to build an 11.9-mile portion of a 22-mile, 18 inch-diameter forced main sewer line and an upgrade to an existing pump station. The 11.9-mile portion of the sewer line covered in this ARC grant begins at North Coley Road and ends at Tupelo's wastewater treatment plant (exhibit 1, green line, on enclosed compact disc). The remaining 10.1 miles of this sewer line is being constructed by the PUL Alliance with bond funds from the state of Mississippi.

The area of potential effect (APE) is a right-of-way (ROW) 11.9 miles long and twenty feet wide. Most of this APE is in a previously disturbed ROW adjacent to Coley and other roads. Another substantial stretch of this APE lies within the previously surveyed ROW of the expansion and relocation of Mississippi Route 6. The Mississippi Department of Transportation (MDOT) surveyed this ROW and completed the Section 106 review in 1997. Initially, MDOT identified only one archaeological site (22-Po-691) whose eligibility for the National Register of Historic Places (NRHP) was in question (Exhibit 2). Subsequent re-evaluation in 2002-2007 identified a new site, 22-Le-678, that was eligible for the NRHP. Neither site 22-Po-691 or 22-Le-678 are within this project's APE.

Please also note on Exhibit 1 that the APE for this sewer line intersects the Natchez Trace Parkway (NTP). Exhibit 3 indicates that the PUL Alliance has negotiated a solution with the Department of the Interior that allows the sewer to be directionally drilled under NTP.

Prior to TVA's involvement, the PUL Alliance engaged Wildlife Technical Services, Inc. (WTS) to support the environmental review of this project. WTS engaged Dr. Jay Johnson of the University of Mississippi to perform a survey for cultural resources. This survey was completed on March 12 and the resulting report submitted to the Mississippi State Historic Preservation Officer (SHPO) on April 4, 2008. On the enclosed compact disc is a copy of Johnson's report, *Cultural Resources Survey of the Proposed Toyota Wastewater Alignment, Lee County, Mississippi*.

In his report, Johnson indicates that no new cultural resources were identified in the APE. Two previously recorded sites were revisited and evaluated. Johnson indicates that site 22-Le-999 was identified in the aforementioned MDOT survey and determined ineligible for the NRHP (Exhibit 4). In his reevaluation of the site, Johnson recovered only one prehistoric Baldwin Plain sherd. He concludes that the site does not appear to be significant.

Archaeological site 22-Le-599 was also revisited by Johnson. He notes that, "The portion of the site which is crossed by the proposed pipeline is covered in extremely thin sage grass overlaying the chalk substratum interspersed with small cedar trees..." Further he concludes that, "The portion of 22Le599 that will be impacted by the project has been eroded down to the chalk and no artifacts could be found..." It appears that the extreme western edge of this site has suffered greatly since it was first determined eligible for the NRHP in 1978 (Exhibit 4).

TVA is consulting with the following federally recognized Indian tribes regarding properties within the proposed project's APE that may be of religious and cultural significance to them and eligible for the NRHP: The Chickasaw Nation, Choctaw Nation of Oklahoma, Jena Band of Choctaw Indians, Mississippi Band of Choctaw Indians, Muscogee (Creek) Nation of Oklahoma, Alabama-Coushatta Tribe of Texas, Alabama-Quassarte Tribal Town, Kialegee Tribal Town, Thlophlocco Tribal Town, Absentee Shawnee Tribe of Oklahoma, Eastern Shawnee Tribe of Oklahoma, Shawnee Tribe, and Seminole Tribe of Florida.

By this letter, TVA is providing notification of these findings, and is seeking your comments on its determination that:

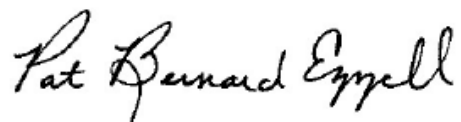
- No new cultural resources have been identified in this project's APE;
- Site 22Le999 is not eligible for the NRHP and poses no impediment to this project; and
- Site 22Le599, although eligible for the NRHP, has suffered substantial erosion within the APE of this project. The placement of this forced main sewer line will have an effect on this site, but it is not an adverse effect because there are no intact archaeological deposits or features in this APE.

Please also note the enclosed Mississippi State Historic Preservation Officer's April 14 letter (Exhibit 5 on the compact disc) indicating that they have no objection with the proposed undertaking.

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April 25, 2008

Should you have any questions, please contact me via e-mail at pbezzell@tva.gov or via phone at (865) 632-6461. Tom Maher is the TVA archaeologist reviewing this project. You may contact him at 865-632-7452 or tomaher@tva.gov. Please respond within 30 days of receipt of this letter if you have any comments on this proposed undertaking.

Sincerely,

A handwritten signature in black ink that reads "Pat Bernard Ezzell". The signature is written in a cursive, flowing style.

Patricia Bernard Ezzell
Historian/Native American Liaison

TOM:PBE:IKS
Enclosure
cc: EDMS, WT 11D-K



the
Chickasaw
Nation HEADQUARTERS

Arlington at Mississippi / Box 1548 / Ada, OK 74821-1548 / (580) 436-2603

Bill Anoatubby
Governor

Jefferson Keel
Lieutenant
Governor

June 2, 2008

Ms. Pat Bernard Ezzell
Historian/Native American Liaison
Tennessee Valley Authority
400 West Summit Hill Drive
Knoxville, TN 37902-1499

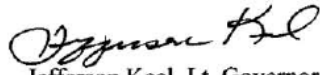
Dear Ms. Ezzell:

Thank you for your letter of notification regarding the \$1,500,000 Appalachian Regional Commission (ARC) grant being administered by Tennessee Valley Authority (TVA) to the Pontotoc, Lee, and Union Counties (PUL) Alliance to build an 11.9-mile portion of a 22-mile, 18 inch diameter forced main sewer line between Coley Road and the Tupelo wastewater treatment plant in Lee County, Mississippi. This area is very important to the Chickasaw Nation because we attach religious and cultural significance to this part of Mississippi.

The APE is in a location that contains hundreds of historic and sacred sites once used by the Chickasaw Nation who were forcibly removed by federal action. We did not abandon these sites. Because of the potential to uncover sacred locations we request that an archaeologist monitor construction of this forced sewer main. In the event of inadvertent discoveries, we request all construction activities cease and notification to the Chickasaw Nation be made immediately so that we may evaluate and determine if confidential Chickasaw sacred sites have been discovered. In the case of discovery we further request consideration to avoid and to leave sites intact.

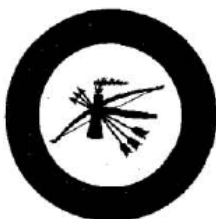
If you have any questions, please contact Ms. Gingy Nail, historic preservation officer, at (580) 559-0817.

Sincerely,


Jefferson Keel, Lt. Governor
The Chickasaw Nation



God Bless America!



Choctaw Nation of Oklahoma

P.O. Box 1210 • Durant, OK 74702-1210 • (580) 924-8280

Gregory E. Pyle
Chief

Gary Batton
Assistant Chief

May 8, 2008

Pat Bernard-Ezzell
Tennessee Valley Authority
400 West Summit Hill Drive
Knoxville, Tennessee 37902-1499

Dear Pat Bernard-Ezzell:

We have reviewed the following proposed project (s) as to its effect regarding religious and/or cultural significance to historic properties that may be affected by an undertaking of the projects area of potential effect.

Project Description: Forced Main Sewer Line between Coley Rd. & Tupelo Wastewater Treatment Plant

Project Location: Lee County, Mississippi

Comments: After further review of the above-mentioned project (s), to the best of our knowledge, it will have no adverse effect on any historic properties in the project's area of potential effect. However, should construction expose buried archaeological or building materials such as chipped stone, tools, pottery, bone, historic crockery, glass or metal items, this office should be contacted immediately @ 1-800-522-6170 ext. 2137.

Sincerely,

Terry D. Cole
Tribal Historic Preservation Officer
Choctaw Nation of Oklahoma

TDC: vr

A Nation of healthy, successful, and productive Choctaws



Jena Band of Choctaw Indians

P. O. Box 14 • Jena, Louisiana 71342-0014 • Phone: 318-992-2717 • Fax: 318-992-8244

May 19, 2008

TENNESSE VALLEY AUTHORITY
400 WEST SUMMIT HILL DR.
KNOXVILLE, TN 37902-1499

**RE: APPALACHIAN REGIONAL COMMISSION GRANT IN SUPPORT OF
AN 11.9 MILE PORTION OF A FORCED MAIN SEWER LINE BETWEEN
COLEY ROAD AND TUPELO WASTEWATER TREATMENT PLANT, LEE
COUNTY, MISSISSIPPI.**

To Whom It May Concern:

Reference is made to your letter dated April 25, 2008, concerning the above-proposed project.

After thorough review of the documents submitted, it has been determined that there will be no significant impact in regards to the Jena Band of Choctaw Indians.

Should you have any questions, please feel free to call me.

Sincerely,

A handwritten signature in cursive script that reads "Lillie McCormick".

Lillie McCormick
Environmental Director
Jena Band of Choctaw Indians
318-992-8258
lstrangejbc@centurytel.net



PO Box 571, Jackson, MS 39205-0571
601-576-6850 • Fax 601-576-6975
mdah.state.ms.us
H. T. Holmes, Director

April 14, 2008

Mike Goff
Wildlife Technical Services, Inc.
P.O. Box 820188
Vicksburg, Mississippi 39182

RE: Cultural Resources Survey of the Proposed Toyota Wastewater Alignment,
MDAH Project Log #04-044-08, Lee County

Dear Mike:

We have reviewed the cultural resources survey report by Dr. Jay K. Johnson, Archaeologist, received on April 4, 2008, for the above referenced undertaking, pursuant to our responsibilities under Section 106 of the National Historic Preservation Act and 36 CFR Part 800. After review, we concur that site 22Le999 is ineligible for listing in the National Register of Historic Places, and that site 22Le599 will not be affected. Therefore, we have no objection with the proposed undertaking.

There remains the possibility that unrecorded cultural resources may be encountered during the project. Should this occur, we would appreciate your contacting this office immediately in order that we may offer appropriate comments under 36 CFR 800.13.

Please provide a copy of this letter to Dr. Johnson. If you need further information, please let us know.

Sincerely,


Jim Woodrick
Review and Compliance Officer

FOR: H.T. Holmes
State Historic Preservation Officer

c: Clearinghouse for Federal Programs

Monitoring Plan

The Pontotoc, Union, and Lee Counties (PUL) Alliance will hire an archaeologist to monitor construction of the force main sewer line in undisturbed areas between the Haven Acres Pumping Station and the Tupelo Wastewater Treatment Plant, Lee County, Mississippi (Figure 1). TVA will approve the selection of the archaeologist, whose qualifications will meet the Secretary of the Interior's professional standards published in the Code of Federal Regulations, 36 CFR Part 61. The minimum professional qualifications in archaeology are a graduate degree in archaeology, anthropology, or closely related field plus:

1. At least one year¹ of full-time professional experience or equivalent specialized training in archeological research, administration or management;
2. At least four months of supervised field and analytic experience in general North American archaeology, and
3. Demonstrated ability to carry research to completion.

In addition to these minimum qualifications, the professional archaeologist conducting the monitoring shall have at least one year of full-time professional experience at a supervisory level in the study of archeological resources of the prehistoric period.

The professional archaeologist will monitor for evidence of prior occupation in the undisturbed areas. Importantly, the professional archaeologist will monitor for, among other things, evidence of:

- 1) human remains—the physical remains of a human body
- 2) funerary objects—items that, as part of the death rite or ceremony of a culture, are reasonably believed to have been placed intentionally at the time of death or later with or near individual human remains
- 3) burial sites—any natural or prepared physical location into which as part of the death rite or ceremony, human remains were deposited
- 4) associated funerary objects—items made exclusively for burial purposes or to contain human remains
- 5) sacred objects—items that are specific ceremonial objects needed by traditional Native American religious leaders for the practice of traditional Native American religions.
- 6) historic properties - as defined in 36 CFR § 800.16.

The PUL Alliance shall provide written authority for the archaeologist to stop construction if such evidence is found.

TVA will notify the Choctaw Nation of Oklahoma and the Chickasaw Nation within forty-eight (48) hours of being informed of the presence of Native American human remains, funerary objects, burial sites, associated funerary objects and/or sacred objects, and invite the Choctaw Nation of Oklahoma and the Chickasaw Nation to comment on any plans developed to treat these remains and/or objects. In accordance with 36 CFR §

¹ A year of full-time professional experience need not consist of a continuous year of full-time work but may be made up of discontinuous periods of full-time or part-time work adding up to the equivalent of a year of full-time experience.

800.13, the Choctaw Nation of Oklahoma and the Chickasaw Nation will be provided forty-eight (48) hours to provide comments on any treatment plan.

The PUL Alliance, in consultation with TVA, the Mississippi State Historic Preservation Officer (MSSHPO), the Choctaw Nation of Oklahoma, and the Chickasaw Nation, shall ensure that the treatment of any human remains, burial sites, funerary objects, associated funerary objects, and sacred objects discovered within the project area complies with all applicable state and federal laws protecting archaeological resources. Whenever and wherever it is feasible, human remains and associated funerary objects shall be preserved in place.

Should human remains be encountered during monitoring, all ground disturbing activities within fifty (50) feet of the discovery will be ceased immediately. The remains and objects discovered will be treated with respect to the deceased, and shall be protected from the time of discovery from further construction activities pending consultation to resolve treatment of such remains. The PUL Alliance or their designee shall immediately contact law enforcement, the County Coroner, the State Archaeologist², and TVA. The PUL Alliance, in consultation with TVA, MSSHPO, the Choctaw Nation of Oklahoma and the Chickasaw Nation, shall ensure that those remains and objects are treated in a manner that is consistent with the Advisory Council of Historic Preservation's "Policy Statement Regarding Treatment of Burial Sites, Human Remains, and Funerary Objects (2007)" and the policies of the Choctaw Nation of Oklahoma and the Chickasaw Nation regarding the treatment of human remains and funerary objects.

Once the post-review monitoring has taken place, the professional archaeologist shall provide to TVA a report that will include,

- 1) a detailed description of the monitoring process that includes descriptions of soil and geologic strata encountered ,
- 2) a time line indicating the dates when the monitoring took place, and
- 3) a discussion of what was encountered and its significance.

This report will be provided to TVA two weeks after the final day of monitoring work if no significant archaeological artifacts or deposits are encountered. A more detailed report may be necessary if the monitoring results in discovery of significant archeological resources or deposits.

² Chief archaeologist at the Mississippi Department of Archives and History.



Figure 1. Aerial photograph showing area of monitoring for archaeological sites